

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**WADLEY PIERRE,**

**Plaintiff,**

**v.**

**PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE, MARTIN  
BRESLIN, and RICHARD SPINGEL,**

**Defendants.**

**Civil Action No. 13-12055-MLW**

**JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1**

Pursuant to Local Rule 16.1(D), the parties hereby state as follows:

I. **PROPOSED PRE-TRIAL SCHEDULE AND DISCOVERY PLAN**

A. Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1) by:

--March 3, 2014

B. Discovery Completed by:

--December 1, 2014

C. Dispositive Motions.

--Filing of Dispositive Motions- January 15, 2015

--Opposition to Dispositive Motions- March 2, 2015

--Replies to Opposition to Dispositive Motions- March 23, 2015

D. Expert Disclosure by:

--October 1, 2014

E. Final Pre-Trial Conference as scheduled by the Court.

II. SIGNED CERTIFICATIONS UNDER LOCAL RULE 16.1

The Parties' Rule 16.1 Certifications will be filed separately.

III. TRIAL BY MAGISTRATE JUDGE

At this time, the parties do not consent to a trial by Magistrate Judge.

Respectfully submitted,

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE,  
MARTIN BRESLIN, and  
RICHARD SPINGEL,

By their attorneys,

/s/ Amy Silverman Ostiguy  
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WADLEY PIERRE,

By his attorneys,

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Dated: February 7, 2014

**CERTIFICATE OF SERVICE**

I, Amy Silverman Ostiguy, hereby certify that this document was filed through the ECF system on this date, and that a true paper copy of this document will be sent to those indicated as non- registered participants on the Notice of Electronic Filing by first class mail on the same date.

Dated: February 7, 2014

/s/ Amy Silverman Ostiguy  
Amy Silverman Ostiguy